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June 21, 2012

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
Clarkson S. Fisher Federal Building
and United States Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Takeda Pharmaceutical Company Limited, *et al.* v. Zydus Pharmaceuticals
(USA) Inc., *et al.* Case No. 3:10-cv-01723-JAP-TJB

Dear Judge Bongiovanni:

We represent defendants Zydus Pharmaceuticals (USA) Inc. and Cadila Healthcare Limited ("Zydus"), in the above-referenced patent action. On June 19, 2012 Zydus filed a Motion for Reconsideration of Order Denying-in-Part Leave to Amend Preliminary Invalidity and Non-infringement Contentions (Docket No. 195).

Based on Zydus' pending Motion for Reconsideration and the fact that the parties have presently agreed to adjourn the August 13, 2012 trial date to a later date to be scheduled by the Court, Zydus respectfully requests that Your Honor stay the June 21, 2012 deadline for Zydus to serve its Second Amended Non-Infringement Contentions on Takeda until the Court has issued a decision on the pending Motion for Reconsideration. Takeda does not object to such a stay.

We appreciate Your Honor's attention to this matter

Respectfully yours,

s/ Vincent P. Rao, II

Vincent P. Rao, II

cc: Counsel for Record via electronic mail